

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

RAS Citron, LLC  
Authorized Agent for Secured Creditor  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Facsimile: 973-404-8886

Laura Egerman, Esq. (LE-8250)

In Re:

**Roseanne T. Puleo,**  
  
**Debtor.**

Case No.: 18-29938-MBK

Chapter: 7

Hearing Date: November 19, 2018

Judge: Michael B. Kaplan

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

HEARING DATE AND TIME:  
November 19, 2018 at 10:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT  
OPPOSITION IS TIMELY FILED**

TO:

<b>Debtor-</b> Roseanne T Puleo 432 Holmes Drive Burlington, NJ 08016	<b>Debtor's Attorney-</b> Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	<b>Trustee-</b> Andrea Dobin Trenk DiPasquale 427 Riverview Plaza Trenton, NJ 08611	<b>U.S. Trustee-</b> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on **November 19, 2018, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper, the within creditor ("Creditor"), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at 402 East State Street, Trenton, N.J. 08608, Courtroom #8, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from

automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202, Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: October 24, 2018

RAS Citron, LLC  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
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By: /s/ Laura Egerman  
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